UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: August 23, 1985

SUBJECT: Pratt & Whitney Trial Burn

FROM: John M. Carlson, Environmental Engineer JMC
Air Section, ESD

TO: Andrew Hoffman
CT/RI Waste Program Section, WMD (HSC-1903)

I have reviewed the Pratt and Whitney (P&W) trial burn plan and offer the following comments.

1. The pressure drop across both the packed tower scrubber and demister should be added to the list of "suggested operating conditons" found on page 141 of the P&W submittal.

2. Combustion gas velocity, as measured by the system discussed on page 138 of the P&W submittal, should be added to the list of "suggested operating conditons."

3. Stack oxygen readings from the Charlton Technology, Inc. monitoring system should be added to the list of "suggested operating conditions."

4. The oxygen and carbon monoxide monitors should successfully complete Performance Specification Test (PST) 3 and 4, respectively, prior to the trial burn. PST 3 is found in 40 CFR 60, Appendix B. PST 4 was published on pages 31700-31702 of the August 5, 1985 Federal Register.

5. All instrumentation which will be used to measure or record incinerator and control equipment operating conditions should be calibrated, according to the manufacturer's recommended procedures, prior to the test burn.

6. Anticipated feed rates for each waste stream and auxiliary fuel were not specified in gallons/minute.

7. Procedures for ash sampling and analysis were not specified.

8. Nitrogen oxides emissions testing is not required by EPA regulations.

9. Scrubber inlet particulate and carbon monoxide sampling is not required by EPA regulations (see Tables VI - IX of RECON submittal.

10. On page 26, RECON proposes using a modified Method 5 sampling train for POHC testing, while on page 49, the SASS train is proposed. Which method do they intend to use?

11. RECON has presented a general description of the sampling and analytical techniques to be used. A much more detailed sampling and analysis protocol should be submitted.